

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RADHIKA VEGESNA, Personal :  
Representative of the ESTATE :  
OF RAJESH PADMARAJU, Deceased :  
Plaintiff :  
VS. : NO. 03 - 295 ERIE  
:

ISD TRANSPORTATION COMPANY, :  
INC., MANDEEP SINGH, SAMINDER :  
SINGH, and SAMINDER SINGH, :  
d/b/a ISD TRANSPORTATION :  
COMPANY, INC., Defendants :  
:

RADHIKA VEGESNA, Personal :  
Representative of the ESTATE :  
OF RAJESH PADMARAJU, Deceased :  
Plaintiff :  
:

VS. : NO. 03 - 317 ERIE

SAMINDER SINGH, and SAMINDER :  
SINGH, d/b/a ISD :  
TRANSPORTATION COMPANY, :  
Defendants :  
:

RADHIKA VEGESNA, Personal :  
Representative of the ESTATE :  
OF RAJESH PADMARAJU, Deceased :  
Plaintiff :  
:

VS. : NO. 04 - 34 ERIE

ISD TRANSPORTATION COMPANY, :  
INC., SAMINDER SINGH, :  
SAMINDER SINGH, d/b/a ISD :  
TRANSPORTATION COMPANY, INC., :  
MANDEEP SINGH and GURMINDER :  
SINGH, Defendants :  
:

PLAINTIFF'S INTERROGATORIES  
DIRECTED TO DEFENDANT, MANDEEP SINGH

AND NOW comes the Plaintiff, by her counsel, ANDREW J.  
CONNER of CONNER RILEY & FRYLING, 17 West Tenth Street, P.O. Box  
860, Erie, Pennsylvania 16512-0860 and, per F.R.C.P. 33, files

these Interrogatories directed to Defendant, Mandeep Singh, to be answered separately and fully in writing under oath within thirty (30) days after the service thereof. These Interrogatories are deemed to be continuing in nature so as to require supplemental Answers if the Defendant, or anyone on his behalf, obtains further information between the time the Answers are filed and served and the time of trial.

1) Please state the following:

(a) Your date and place of birth;

ANSWER:

(b) Your Social Security Number;

ANSWER:

(c) Whether you are (and were, as of October 5, 2001) a United States Citizen;

ANSWER:

(d) If so, please state the date and place you became a United States Citizen;

ANSWER:

(e) If not, please state what country you were a citizen;

ANSWER:

(f) If not, please state the date and place when Mandeep Singh entered the United States;

ANSWER:

(g) If not, whether you entered the United States with a VISA (please attach copies of any VISAs issued to Mandeep Singh within the scope of this Interrogatory);

ANSWER:

(h) If not, whether you were issued any "green card" by immigration and naturalization and/or any United States agency (please attach copies of any green cards issued to Mandeep Singh within the scope of this Interrogatory).

ANSWER:

(i) The extent of your formal education;

ANSWER:

(j) The name and address of the school, college, university or institution where you received your last formal education;

ANSWER:

(k) The date and place where you received your last formal education;

ANSWER:

(l) Whether you received any formal training in operating a tractor-trailer and, if so, please state the name and address of the party who provided this training to you and the dates that training was provided;

ANSWER:

(m) Whether you are fluent in the English language; if not, the languages you are fluent in;

ANSWER:

(n) If you are now, or in the past have been, in the United States on the green card, please state the date when your green card was first issued, and any renewal dates thereafter.

ANSWER:

2) With respect to your employment prior to any employment with ISD, please state:

(a) The names and addresses of your employers for five (5) years prior to June, 2001;

ANSWER:

(b) The dates of employment with your past employers;

ANSWER:

(c) Your job titles with those former employers;

ANSWER:

(d) The name of your immediate supervisor with any past employers;

ANSWER:

(e) Whether you performed a "road test" per Section 391.31, et al of the Federal Motor Carrier Safety Regulations

and, if so, the date, place, name and address of the party who supervised the performance of the road test.

ANSWER:

3) From the date you first received any commercial driver's license, please state the following:

(a) The place and location of any moving violations you received from any state, municipality or governmental agency;

ANSWER:

(b) The place and location of any motor vehicle accidents involving vehicles in which you were operating.

ANSWER:

4) With regard to any license, other than yours, please state the following:

(a) Whether you were in possession of a driver's license for Mandeep Singh of 1639 Hooper Road, Yuba City, California as of October 5, 2001, and/or the date of the fatality giving rise to the within action;

ANSWER:

(b) When you first obtained that driver's license;

ANSWER:

(c) Where you obtained that driver's license;

ANSWER:

(d) How you obtained that driver's license:

ANSWER:

(e) Whether you are currently in possession of that  
driver's license;

ANSWER:

(f) The overall time period you had that license;

ANSWER:

(g) If you are not in possession of that driver's  
license, the last date you had that driver's license;

ANSWER:

(h) If that license was given to another party, the name and address of the other party who was given that license.

ANSWER:

5) As of June, 2001, when you first became employed by any other party named as a Defendant in this action, please state the following:

(a) The name and address of the employing motor carrier;

ANSWER:

(b) The address where you resided during the three years preceding the date his application for employment was submitted;

ANSWER:

(c) The date when your application for employment was submitted to ISD or its representatives;

ANSWER:

(d) The first date of your employment with ISD or its representatives;

ANSWER:

(e) The issuing state, number and expiration date of each unexpired commercial vehicle operator's license or permit that had been issued to you prior to your first date of employment;

ANSWER:

(f) The nature and extent of your experience in the operation of motor vehicles, including the type of equipment, such as buses, trucks, truck tractors, semi-trailers, full trailers and pull trailers, which he had operated;

ANSWER:

(g) A list of all motor vehicle accidents in which you were involved during the three years preceding the date his application was submitted, specifying the date and nature of each accident and any fatalities or personal injuries caused;

ANSWER:

(h) A list of all violations of motor vehicle laws and ordinances, other than violations involving only parking, of which you were convicted or forfeited bond or collateral during the three years preceding the date his application for employment was submitted;

ANSWER:

(i) A statement setting forth in detail the facts and circumstances of any denial, revocation or suspension of any license, permit or privilege to operate a motor vehicle which had been issued to you, or a statement that no such denial, revocation or suspension had occurred;

ANSWER:

(j) A list of the names and addresses of Mandeep Singh's employers during the three years preceding the date his application for employment was submitted, together with the dates he was employed by each employer and his reason for leaving or terminating that employment.

ANSWER:

6) With regarding to any commercial driver's license issued to you prior to October 5, 2001, please state;

(a) The driver's license number, the identity of any state and the date of issuance of any commercial driver's license to you;

ANSWER:

(b) Whether you underwent any road test as a condition for obtaining any license within the scope of this Interrogatory;

ANSWER:

(c) If the answer to (b), above, is "yes", the date, place, location and the party which conducted any road test within the scope of this Interrogatory.

ANSWER:

Respectfully submitted,

CONNER RILEY & FRYLING

BY

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ANDREW J. CONNER, ESQUIRE  
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DATED: December 2, 2004